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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Interconnection and Resale	)	CC Docket No. 94-54
Obligations Pertaining to	)	
Commercial Mobile Radio Services	)	

To: The Commission

REPLY COMMENTS

BELLSOUTH CORPORATION

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November 22, 1996

SUMMARY

Consistent with the "pro-competitive, deregulatory national policy framework" governing the communications industry, BellSouth urges the Commission to allow market forces, rather than regulation, to shape the development of automatic roaming arrangements throughout the CMRS industry. Nothing in the record establishes that the market will fail to protect against anticompetitive behavior with regard to the provision of automatic roaming. Moreover, even assuming market forces were inadequate to protect against anticompetitive behavior, Section 208 of the Communications Act is an efficient mechanism for remedying anticompetitive conduct. Accordingly, the Commission should forbear from enacting new regulations designed to ensure that automatic roaming arrangements are available to all CMRS providers.

Adoption of an automatic roaming requirement is not the panacea some commenters believe it to be. Because dual-mode handsets are not widely available, requiring all CMRS providers to enter into automatic roaming agreements will not ensure that automatic roaming is available to subscribers. An automatic roaming requirement also will impose unnecessary costs and burdens on CMRS providers. As the Commission has noted, "regulation[] necessarily implicates costs, including administrative costs, which should not be imposed *unless clearly warranted.*" One important cost associated with automatic roaming is fraud and an automatic roaming requirement will undoubtedly increase fraud-related losses. If automatic roaming would reduce administrative costs associated with roaming, regulatory intervention would be unnecessary.

The question for the Commission is whether automatic roaming should be mandated or whether the marketplace will foster widespread automatic roaming. Based on the cellular experience and the record in this proceeding, there is no reason to believe that widespread automatic roaming will not permeate the CMRS industry without regulatory intervention. In this regard, the Commission should reject claims that roaming constitutes a form of interconnection subject to Section 251. Interconnection occurs when two carriers connect their systems directly for the transport and termination of traffic, so that traffic originated on one network can be terminated on the other network. This simply is not what happens in a roaming scenario.

Finally, consistent with the Commission's decision relating to resale, if an automatic roaming requirement is adopted, it should sunset five years after the current D, E, and F Block PCS auctions conclude. Any perceived need to require automatic roaming must be balanced against the public interest of encouraging the aggressive build-out of new networks. To ensure prompt build-out, the Commission should allow a CMRS licensee to deny automatic roaming to customers of other CMRS providers five years after the D, E, and F Block PCS auctions conclude.

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BellSouth Corporation ("BellSouth"), by its attorneys, hereby replies to comments submitted in response to the Commission's *Third Notice of Proposed Rule Making*, FCC 96-284 (Aug. 15, 1996) ("*NPRM*"), *summarized*, 61 Fed. Reg. 20949 (Apr. 28, 1995) in this docket. BellSouth concurs with the vast majority of commenters that opposed adoption of an automatic roaming requirement.[1] Most parties, including BellSouth, noted that such a requirement is inconsistent with Congressional intent behind the Telecommunications Act of 1996 and the FCC policy of allowing the marketplace, rather than regulation, to dictate the development of the wireless marketplace.[2]

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[1] BellSouth Comments at 2-4 (Oct. 4, 1996); AirTouch Communications, Inc. Comments at 2 (Oct. 4, 1996); Ameritech Comments at 1-4 (Oct. 4, 1996); AT&T Wireless Services, Inc. ("AT&T") Comments at 3-7 (Oct. 4, 1996); Bell Atlantic NYNEX Mobile, Inc. ("BANM") Comments at 3-9 (Oct. 4, 1996); CTIA Comments at 4-8, 10-20 (Oct. 4, 1996); Century Cellunet, Inc. Comments at 2-4 (Oct. 4, 1996); GTE Mobilnet ("GTE") Comments at 2-6 (Oct. 4, 1996); PCIA Comments at 1 (Oct. 4, 1996); PrimeCo Personal Communications, L.P. ("PrimeCo") Comments at 9-18 (Oct. 4, 1996); Rural Cellular Association ("RCA") Comments at 3-4 (Oct. 4, 1996); Rural Telecommunications Group ("RTG") Comments at 2-9 (Oct. 4, 1996); Southwestern Bell Mobile Systems, Inc. ("SWB") Comments at 1-19 (Oct. 3, 1996); Sprint Spectrum L.P. ("Sprint") Comments at 2-7 (Oct. 4, 1996); 360° Communications Company ("360°") Comments at 2-4 (Oct. 4, 1996); Vanguard Cellular Systems, Inc. Comments at 5-6 (Oct. 4, 1996).

[2] BellSouth Comments at 2-4; BANM Comments at 5-7; CTIA Comments at 10-12; Century Cellunet Comments at 3-4; GTE Comments at 2-4; PrimeCo Comments at 17-18; RTG Comments (continued...)

Only four parties supported adoption of an automatic roaming requirement.[3] As discussed below, the comments of these parties do not form a sufficient record on which to base an automatic roaming requirement.

I. THE RECORD TO DATE DOES NOT JUSTIFY THE IMPOSITION OF AN AUTOMATIC ROAMING REQUIREMENT

Over the past three years, Congress has created a "pro-competitive, de-regulatory national policy framework."[4] Consistent with this framework, the FCC has stated that "all regulation[] necessarily implicates costs, including administrative costs, which should not be imposed *unless clearly warranted.*"[5] In this regard, the FCC's general policy is to "allow[] market forces, rather than regulation, to shape the development of competition."[6] Even in the current *NPRM*, the

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[2] (...continued)
at 2-5; SWB Comments at 1-9; Sprint Comments at 4-6; 360° Comments at 2-3; Vanguard Comments at 5-6.

[3] Alliance of Independent Wireless Operators ("AIWO") Comments at 6-19 (Oct. 4, 1996); Integrated Communications Group Corporation Comments at 1-2 (Oct. 4, 1996); Radiofone, Inc. Comments at 1-2 (Oct. 4, 1996); Western Wireless Corporation ("WWC") Comments at 2-13 (Oct. 4, 1996).

[4] *See* The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996); H.R. Conf. Rep. No. 104-458, 104th Cong., 2d Session 113 (1996); Omnibus Budget Reconciliation Act of 1993, Pub. L. No. 103-66, Title VI, § 6002(b) (1993); *see also NPRM* at ¶ 27.

[5] *Interconnection and Resale Obligations Pertaining to Commercial Mobile Radio Services*, CC Docket No. 94-54, *First Report and Order*, 3 Comm. Reg. (P&F) 895, ¶ 14 (1996). *See* BANM Comments at 5.

[6] *See NPRM* at ¶ 26; *Implementation of Section 302 of the Telecommunications Act of 1996 — Open Video Systems*, CS Docket No. 96-46, *Second Report and Order*, FCC 96-249, ¶ 106 (June 3, 1996); *WNYC Communications Group*, 3 Comm. Reg. (P&F) 400, ¶ 11 (Video Serv. Div. 1996); *Implementation of Sections of the Cable and Television Consumer Protection and Competition Act of 1992*, MM Docket No. 92-266, *Report and Order and Further Notice of Proposed Rulemaking*, 8 F.C.C.R. 5631, ¶ 327 (1993); *Intelligent Networks*, CC Docket No. 91-346, *Notice of Inquiry*, 6 F.C.C.R. 7256, ¶ 14 (1991).

Commission has described its general regulatory policy as "allowing market forces rather than regulation to shape the development of wireless services."[7] Accordingly, unless the record clearly establishes that market forces are inadequate to protect against anticompetitive behavior, the Commission should forbear from enacting regulation designed to prevent such conduct.

Moreover, even assuming market forces were inadequate to protect against anticompetitive behavior, the Commission should forbear from enacting new regulations ***unless*** existing regulations also are inadequate to protect against such behavior. Given the Commission's determination that roaming is a common carrier service,[8] Section 208 is an efficient mechanism for remedying anticompetitive conduct. In fact, the Commission relied on the availability of Section 208 as the basis for forbearing from applying numerous Title II provisions to CMRS providers.[9] It would be inconsistent for the Commission to find Section 208 sufficiently effective to deter anticompetitive conduct and thereby justify forbearance from much of Title II for the CMRS industry, yet find Section 208 inadequate to protect CMRS carriers from anticompetitive conduct with regard to CMRS roaming issues.[10]

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7 *NPRM* at ¶ 27.

8 *NPRM* at ¶ 10.

9 *Implementation of Sections 3(n) and 332 of the Communications Act*, GN Docket No. 93-252, *Second Report and Order*, 9 F.C.C.R. 1411, 1479 (1994). To the extent "carriers regularly threaten to cancel roaming agreements in negotiations . . . for improper reasons" (AIWO Comments at 16-17), Section 208 is the appropriate remedy. One commenter is currently utilizing Section 208 to resolve a roaming dispute with a BellSouth affiliate. *See* Radiofone Comments at 1-2. BellSouth notes that one issue in that proceeding concerns whether previously existing Commission policies obligated BellSouth to provide Radiofone with automatic roaming, which the Commission has indicated in this proceeding has not been required to date. Indeed, the Commission seeks comment on whether such a requirement should be imposed in the future.

10 *See* CTIA Comments at 8; PrimeCo Comments at 13.

In extending the cellular manual roaming obligation to all broadband CMRS providers, the Commission found "no specific evidence in the record of unreasonable discrimination against PCS licensees concerning the provision of roaming."[11] Because some PCS providers have commenced operations since commencement of this proceeding, the Commission sought to freshen the record by soliciting comments on the need for an automatic roaming requirement.[12] PCS and cellular licensees in both rural and urban areas overwhelmingly opposed adoption of such a requirement.[13] For the most part, these parties established that:

- It is premature to determine whether Commission intervention is necessary because the PCS industry is still in its nascency.[14]
- There is no evidence that incumbent CMRS providers are unlikely to enter into automatic roaming agreements with new entrants, such as PCS licensees, assuming compatible subscriber equipment is widely available.[15]

Only a single party specifically claimed that it was attempting to negotiate automatic roaming agreements with incumbents but unable to secure such agreements.[16] Notably, few facts were given regarding the *two* instances in which it was unable to secure an automatic roaming agreement. These two vague instances can not form an adequate record on which to base an

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11 *NPRM* at ¶ 20.

12 *NPRM* at ¶ 16.

13 *See* note 1.

14 BANM Comments at 3-4; PCIA Comments at 8-9; Sprint Comments at 2-4; Vanguard Comments at 4-6.

15 Ameritech Comments at 1-4; AT&T Comments at 7; BANM Comments at 5-6; CTIA Comments at 4-8; GTE Comments at 4-5; Century Comments at 3; PCIA Comments at 1, 6-7; PrimeCo Comments at 9-11; RCA Comments at 4; RTG Comments at 3-4; Sprint Comments at 5-6; SWB Comments at 3, 5-9; 360° Comments at 3; Vanguard Comments at 2-3.

16 WWC Comments at 3-5.

automatic roaming requirement.[17] Two currently operating PCS providers — PrimeCo and Sprint — and the PCS industry association — PCIA — all oppose the imposition of a requirement as premature. BellSouth concurs with PCIA that the Commission should refrain from adopting new regulations governing roaming until the PCS industry has had time to develop.

II. AN AUTOMATIC ROAMING REQUIREMENT IS PREMATURE AND WILL CREATE MORE PROBLEMS THAN BENEFITS

As many commenters, including Sprint and PCIA, note, it is premature to adopt an automatic roaming requirement.[18] According to PrimeCo, automatic roaming is not essential for PCS development and competition between PCS providers and incumbent CMRS licensees.[19] It notes the experience of Sprint in Washington, DC as evidence — without roaming capabilities, and an aggressive advertising campaign by an incumbent identifying this fact, Sprint has grown to more than 100,000 subscribers in its first year of operation.[20] Moreover, BellSouth agrees with PrimeCo, Sprint, and PCIA that there is no evidence of a widespread refusal among incumbent CMRS providers to enter into roaming agreements.[21] "It is simply too early in the development of PCS

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[17] Given that no other PCS provider claimed that incumbent CMRS providers were not negotiating automatic roaming agreements in good faith, the fact that a single commenter has been unable to secure such an agreement in two instances may be more indicative of a party-specific problem in the particular negotiations than a systemic problem requiring a regulatory solution. Incumbent operators may be reluctant to enter into automatic roaming agreements until it is clear that there are no technology problems and that dual-mode equipment would be available. Until such equipment is available, there is no need for an agreement.

[18] BANM Comments at 3-4; PCIA Comments at 8-9; Sprint Comments at 2-4; Vanguard Comments at 4-6.

[19] PrimeCo Comments at 10.

[20] PrimeCo Comments at 10. *Accord* BANM Comments at 6.

[21] PrimeCo Comments at 13-14; Sprint Comments at 2-4; PCIA Comments at 1-2, 6-9.

networks for a reliable assessment of whether an automatic roaming rule is needed to ensure that emerging CMRS operators are able to secure automatic roaming capabilities on a reasonable and nondiscriminatory basis."[22]

A. Dual-Mode Handsets Are Presently Unavailable

Adoption of an automatic roaming requirement is not the cure-all some commenters believe it to be. According to PrimeCo,

> the greatest impediment to roaming is *technical* and *not regulatory*. PCS telephones, for a variety of reasons, are incompatible with existing cellular and ESMR systems. Until dual-mode handsets are available (and accepted by the public), PCS subscribers will have no means of roaming on [other CMRS] networks.[23]

In other words, an automatic roaming requirement is a solution in search of a problem.

Moreover, once dual-mode handsets become available and are accepted by the public, a customer's ability to roam may still be limited by the technologies supported by the phone. A dual-mode handset capable of operating on both PCS and cellular spectrum, for example, will be useless unless it can work with the technologies used by the PCS and cellular providers in a particular market.

The Commission wisely decided not to choose one technology over others for PCS, and to let the standards be developed in response to market forces. Mandating automatic intersystem roaming would undercut this market-oriented approach very substantially, because it would force technology in a particular direction, effectively picking winners and losers. This is because adoption of an automatic roaming requirement may force carriers to create numerous inefficient "stop-gap"

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22 PCIA Comments at 8.

23 PrimeCo Comments at 10. *Accord* BellSouth Comments at 3-4.

measures to permit automatic roaming. This diversion of resources will slow the development of more efficient roaming technologies and will strain the abilities of many carriers to develop and implement other technical innovations necessary for compliance with CMRS number portability requirements.[24]

B. Application of An Automatic Roaming Requirement Will Impose Unnecessary Costs and Burdens on CMRS Providers

According to the Alliance of Independent Wireless Operators ("AIWO"),[25] an automatic roaming requirement is necessary to ensure that small, independent CMRS carriers are able to receive the benefits of automatic roaming.[26] AIWO also claims that an automatic roaming requirement will not increase costs or administrative complexities for carriers. Both of these claims are untrue.

First, despite AIWO's claims, most rural carriers oppose mandatory automatic roaming. Both the Rural Cellular Association ("RCA") and the Rural Telephone Group ("RTG") submitted comments diametrically opposed to AIWO's positions.[27] RCA states that because "voluntary negotiations have . . . proven effective and efficient, there is no need to devise a regulatory substitute."[28] Similarly, RTG directly rebuts AIWO's assertions by stating

> As a representative of rural telephone companies with small cellular systems and a desire to enter new services such as PCS, RTG is sensitive to the Commission's concern that new entrants and small providers may be shut-out

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24 *See* SWB Comments at 12-13.

25 AIWO members are primarily independent cellular operators.

26 AIWO Comments at iii, 4-6.

27 RCA Comments at 3-5; RTG Comments at 1-10.

28 RCA Comments at 5.

> of roaming arrangements by large national CMRS providers. RTG certainly would supply the Commission with evidence if RTG's members experienced such behavior. This is not the case however. Nor in a competitive environment does RTG anticipate that it will be the case. Absent evidence of widespread abuse, an industry-wide rule is unnecessary. The Commission would better serve the public interest by resolving individual roaming complaints under § 208 of the Communications Act of 1934, as amended.[29]

According to RTG, an automatic roaming rule would actually "harm small and rural CMRS providers."[30] Thus, an automatic roaming requirement is not necessary to ensure that small, independent CMRS providers are able to obtain automatic roaming agreements.[31]

Moreover, the imposition of an automatic roaming requirement will increase costs and administrative complexities for CMRS providers. The Commission itself has noted that "regulation[] necessarily implicates costs, including administrative costs, which should not be imposed *unless clearly warranted.*"[32] CTIA estimates that the average cost of *manual* roaming is

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[29] RTG Comments at 4.

[30] RTG Comments at 7.

[31] AIWO claims that large incumbent CMRS provider's attempt to impose unreasonable roaming rates on small, independent providers. AIWO Comments at 9-10. BellSouth's experience has been to the contrary. Small, independent operators often charge higher than average roaming rates to adjacent larger carriers, effectively creating a "roaming toll booth." AIWO itself acknowledges that "many Rural Service Area ("RSA") systems are specifically designed to serve roamers" (AIWO Comments at 5), despite the FCC's prohibition on systems designed solely to serve roamers. *See* 47 C.F.R. § 22.946(a)(1) ("a cellular system is not considered to be providing service . . . if the system intentionally serves only roamer stations.").

[32] *Interconnection and Resale Obligations Pertaining to Commercial Mobile Radio Services*, CC Docket No. 94-54, *First Report and Order*, 3 Comm. Reg. (P&F) 895, ¶ 14 (1996). *See* BANM Comments at 5.

$53,953 for many carriers.[33] If automatic roaming would reduce these costs as AIWO claims,[34] regulatory intervention would be unnecessary. Accordingly, carriers will have market-based incentives to enter into automatic roaming agreements when it saves them money over manual roaming, or when customer demands and competitive circumstances warrant. It should not be mandated by the FCC, however, because that would impose costs on some carriers that are not economically justified. In fact, the Commission has recognized that the additional burden of automatic roaming may be too much for some carriers to bear.[35] In this regard, automatic roaming "may be requested by a carrier in an attempt to increase a rival provider's costs."[36]

AIWO also implies that an automatic roaming requirement will not be burdensome on carriers because a cellular clearinghouse system already exists.[37] What AIWO fails to appreciate, however, is that "[c]ellular companies use the industry standard of CIBER format to exchange information through the clearinghouse. PCS providers using GSM technology will not be able to exchange information using CIBER, creating a necessity for conversion, which would increase costs."[38]

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33 CTIA Comments at 18.

34 AIWO Comments at iii, 15, 18.

35 *NPRM* at ¶ 29. Moreover, BellSouth concurs with SWB that the costs of automatic roaming are going to increase substantially as a result of new CMRS number portability requirements. *See* SWB Comments at 13.

36 CTIA Comments at 15.

37 AIWO Comments at iii, 15.

38 SWB Comments at 2 & Attachment A.

Finally, an automatic roaming requirement will increase fraud-related losses. As BellSouth previously noted, fraud currently costs cellular carriers approximately $750 million per year.[39] Although new methods of fraud detection are being developed, they are not yet available in all markets nor are they compatible with all technologies. Roaming is a frequent means for accomplishing cellular fraud. In fact, some carriers have found it necessary to place limits on automatic roaming in order to prevent fraud.[40] It is for this reason that many cellular carriers are becoming more careful in how they structure automatic roaming agreements. Many cellular carriers apply "an entire set of criteria to prospective roaming partners, including whether the entity in question . . . employs and maintains a call-validation system for fraud prevention."[41] In addition, technological developments are allowing carriers to use new, more cost-effective methods of call validation (*e.g.*, IS41, SS7) through direct communications between switches which, in turn, facilitates additional roaming agreements. A mandatory automatic roaming requirement would prohibit the use of these and similar criteria for deciding whether to enter into an automatic roaming agreement.

C. Manual Roaming Serves The Public Interest

Despite AIWO's claims that manual roaming is a "technological dinosaur,"[42] it does allow all broadband CMRS subscribers to place calls when traveling outside their home market on a

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39 *See* BellSouth Comments at 4.

40 *See* "Leading Cellular Carriers Join Forces to Protect Customers From Becoming Phone Fraud Victims," PR Newswire, Financial Section, Jan. 4, 1995; "Companies Try Different Ways to Combat Cellular Fraud," America's Network, Vol. 99, at 14, Feb. 1, 1995; "Hit By Cell Phone Fees," Successful Meeting, Vol. 44, at 37, Dec. 1995.

41 Ameritech Comments at 3.

42 AIWO Comments at 8.

compatible CMRS system. Further, the Commission has recently found that manual roaming serves the public interest.[43] Moreover, manual roaming still is utilized by every cellular carrier both to comply with the cellular manual roaming obligation and to minimize fraud. When a carrier is experiencing a high incidence of cloning fraud, it often terminates automatic roaming over the block of troubled numbers but continues to offer manual roaming. Manual roaming remains an effective means for carriers to ensure that they will be reimbursed for calls.

Most commenters, including BellSouth, agree that automatic roaming is more attractive than manual roaming. The question for the Commission is whether automatic roaming should be mandated or whether the marketplace will foster widespread automatic roaming. Based on the cellular experience and the record in this proceeding, there is no reason to believe that widespread automatic roaming will not permeate the CMRS industry without regulatory intervention. In most circumstances, automatic roaming arrangements will generate more revenue for a carrier than manual roaming. In a marketplace that is even *partly* competitive, a carrier that refuses to enter into such an arrangement will lose this revenue to a competitor. In the absence of a complete market failure, there simply is no need to mandate automatic roaming.

III. ROAMING IS NOT INTERCONNECTION

BellSouth takes issue with AIWO's claim that roaming constitutes a form of interconnection subject to Section 251.[44] Interconnection occurs when two carriers connect their systems directly for the transport and termination of traffic, so that traffic originated on one network can be terminated on the other network. This simply is not what happens in a roaming scenario. In

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[43] *NPRM* at ¶¶ 12-14.

[44] AIWO Comments at 11-12.

roaming, a customer outside its home system's coverage area uses another carrier's system to originate calls. In so doing, the roaming customer is obtaining service directly from the serving, or "foreign," carrier. The foreign carrier does not typically pass this traffic on to the home carrier for transport or termination; instead, it passes the traffic to an interexchange carrier or LEC. Thus, the only "interconnection" is with the IXC or LEC, not with the customer's home carrier.

A roaming customer, likewise, can receive local calls in the foreign carrier's system via a "roamer port" on a temporarily-assigned number — again without the home carrier's carriage of any traffic. Finally, some cellular carriers offer customers the ability to have calls to their home number forwarded to the system on which they are roaming. This is known by a variety of names, such as "call delivery," "automatic call delivery," "Follow-Me Roaming,™" and "Follow-Me Roaming Plus.™" Even in these cases, however, the home carrier is not transporting or terminating the call — it merely hands it off to an interexchange carrier after completing an IS-41 protocol. Thus, there is no "interconnection" between the foreign carrier and the roamer's home carrier. The foreign carrier merely stands in the shoes of the home carrier and completes the call to or from the roamer. Accordingly, roaming is not a form of interconnection and any analogies to interconnection obligations are inapposite.

IV. IF AN AUTOMATIC ROAMING REQUIREMENT IS ADOPTED, IT SHOULD SUNSET AFTER FIVE YEARS

A single commenter advocates an automatic roaming requirement of unlimited duration. [45] This proposal should be summarily rejected. Consistent with the Commission's decision relating

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[45] AIWO Comments at 18-19.

to resale,[46] any automatic roaming requirement (assuming *arguendo* that one is adopted) should sunset five years after the current D, E, and F Block PCS auctions conclude.[47] Any perceived need to require automatic roaming must be balanced against the public interest of encouraging the aggressive build-out of new networks. An automatic roaming requirement gives a new entrant both the opportunity and incentive to delay building out its system. Rather than expend the resources necessary to promptly build-out its system, the new entrant can build a shell system because its customers will be able to roam on other compatible CMRS systems in the area. To ensure prompt build-out, the Commission should free a CMRS licensee from the obligation to provide automatic roaming to customers of other CMRS providers five years after the on-going D, E, and F Block PCS auctions conclude.

Additionally, once PCS licensees have satisfied their build-out requirements, cellular licensees that refuse to enter into automatic roaming agreements become irrelevant because there is sufficient capacity elsewhere.[48] In the interim, any carriers acting unreasonably in the provision of automatic roaming can be subjected to a Section 208 complaint proceeding. There is nothing in the record, however, to indicate that such proceedings will be required. Rather, it is likely that automatic roaming agreements will become the norm throughout the CMRS industry without regulatory intervention, just as they did in the cellular industry.

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[46] *Interconnection and Resale Obligations Pertaining to Commercial Mobile Radio Services*, CC Docket No. 94-54, *First Report and Order*, 3 Comm. Reg. (P&F) 895 (1996).

[47] *Accord* Vanguard Comments at 9.

[48] *See* Vanguard Comments at 9.

CONCLUSION

For the aforementioned reasons, BellSouth urges the Commission not to adopt an automatic roaming requirement.

Respectfully submitted,
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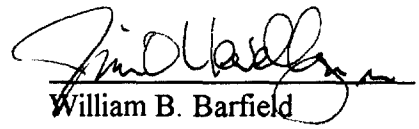
By: 

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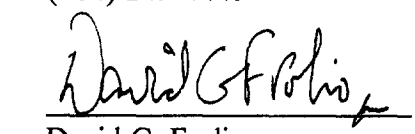
By: 

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